

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION**

<b>IN RE:</b>	§	<b>CASE NO. 19-10280-rlj7</b>
	§	
<b>BIG COUNTRY MOBILE FLEET SERVICES, LLC</b>	§	
	§	
<b>DEBTOR.</b>	§	
	§	<b>CHAPTER 7</b>

**MOTION FOR LEAVE FOR ADMISSION *PRO HAC VICE*  
WITHOUT LOCAL COUNSEL**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW attorney Ryan Dunn who represents secured creditor PeopleFund (“Creditor”) and files this *Motion for Leave for Admission Pro Hac Vice Without Local Counsel*, and would respectfully show the Court as follows:

1. Counsel has moved for admission *pro hac vice*. Under L.B.R. 2090-4, Counsel seeks admission without joining local counsel for the limited purpose to file and if necessary argue an Agreed Motion to Lift Stay, as detailed below. Counsel also intends to file a proof of claim if appropriate.
2. Debtor borrowed money from Creditor and pledged a 2008 F-450 Diesel Truck to Creditor to secure the loan (the Collateral”). Debtor intends to surrender the Collateral to Creditor, the sole lien holder on said Collateral. Counsel intends to move on behalf of his client to lift the stay to reach the asset.
3. Debtor’s attorney, Ashton Anderson, approved the *Agreed Motion for Entry of Order Granting Relief from the Automatic Stay* (and corresponding *Agreed Order*) on March 23, 2020.
4. Counsel emailed Chapter 7 Trustee Harvey Morton on March 10, 2020 alerting him to the impending filing.
5. Counsel is Houston-based and could (and will) attend any hearing necessary if called upon, though it is unlikely that a hearing will be necessary on the

*Agreed Motion and Order to Lift Stay*. The filing of the *Agreed Motion and Order to Lift Stay* will likely end the need for Counsel's ongoing participation in this case other than the possible filing of a proof of claim. Thus, the need for local Abilene-based counsel would also end. Consequently, there appears to be no compelling reason to for the added expense and complication of local counsel, particularly on a routine motion that will likely be unopposed.

6. Counsel, by his signature below, certifies that he will be available to attend hearings on short notice and satisfy the duties normally required by local counsel.

**WHEREFORE, PREMISES CONSIDERED**, Counsel respectfully requests entry of an order to proceed *pro hac vice* without local counsel, unless and until the Court deems local counsel necessary.

Respectfully submitted,

/s/Ryan P. Dunn

Ryan P. Dunn

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**ATTORNEY FOR CREDITOR**

**Certificate of Service**

I hereby certify that on June 12, 2020, a true and correct copy of the above and foregoing *Motion for Leave for Admission Pro Hac Vice Without Local Counsel* been served on each of the following parties in interest via regular, first class mail or electronic means as shown:

**DEBTOR**

Big Country Mobile Fleet Services, LLC  
4258 PR 2590  
Clyde, TX 79510

**DEBTOR'S ATTORNEY**

Ashton R. Anderson  
Anderson Law  
1053 S. 3<sup>rd</sup> St.  
Abilene, TX 79602  
ara@ashtonandersonlaw.com

**TRUSTEE**

Harvey Leon Morton  
Law Office of Harvey L. Morton  
1604 Avenue M  
P.O. Box 10305  
Lubbock, TX 79401  
ecffiling@hlmortonlaw.com

**US TRUSTEE**

US Trustee's Office  
1100 Commerce Bldg. 9C60  
Dallas, TX 75242

/s/ Ryan P. Dunn  
Ryan P. Dunn

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**PROPOSED ORDER GRANTING MOTION FOR LEAVE FOR ADMISSION *PRO*  
*HAC VICE*  
WITHOUT LOCAL COUNSEL**

The Court, having considered the Motion by attorney Ryan Dunn for leave to appear *pro hac vice* without associating local counsel, it is hereby ordered that the Motion is GRANTED.

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ORDER PREPARED BY  
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